

EJK:NS  
F.#2012R00216

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

CORY BROWN,

Defendant.

- - - - -X

THE GRAND JURY CHARGES:

COUNT ONE

(Robbery of Capitol One Bank)

1. On or about September 26, 2011, within the Eastern District of New York, the defendant CORY BROWN did knowingly and intentionally take by force, violence and intimidation, from the person and presence of employees of Capitol One Bank, 356 Fulton Street, Brooklyn, New York, money in the care, custody, control, management and possession of such bank, the deposits of which were then and there insured by the Federal Deposit Insurance Corporation.

(Title 18, United States Code, Sections 2113(a) and 3551 et seq.)

COUNT TWO

(Robbery of TD Bank)

2. On or about September 28, 2011, within the Southern District of New York, the defendant CORY BROWN did

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U.S. DISTRICT COURT  
EASTERN DISTRICT  
OF NEW YORK

I N D I C T M E N T

**CR 12**

**339**

U.S.C., §§  
981(a)(1)(C), 2113(a) and  
3551 et seq.; T. 21,  
U.S.C., § 853(p); T. 28,  
U.S.C., § 2461(c))

**KORMAN, J.**

**LEVY, M.J.**

knowingly and intentionally take by force, violence and intimidation, from the person and presence of employees of TD Bank, 200 West 26th Street, New York, New York, money in the care, custody, control, management and possession of such bank, the deposits of which were then and there insured by the Federal Deposit Insurance Corporation.

(Title 18, United States Code, Sections 2113(a) and 3551 et seq.)

COUNT THREE

(Attempted Robbery of Emigrant Bank)

3. On or about September 29, 2011, within the Southern District of New York, the defendant CORY BROWN did knowingly and intentionally attempt to take by force, violence and intimidation, from the person and presence of employees of Emigrant Bank, 5 East 42nd Street, New York, New York, money in the care, custody, control, management and possession of such bank, the deposits of which were then and there insured by the Federal Deposit Insurance Corporation.

(Title 18, United States Code, Sections 2113(a) and 3551 et seq.)

COUNT FOUR

(Robbery of Chase Bank)

4. On or about October 4, 2011, within the Eastern District of New York, the defendant CORY BROWN did knowingly and intentionally take by force, violence and intimidation, from the

person and presence of employees of Chase Bank, 726 Grand Street, Brooklyn, New York, money in the care, custody, control, management and possession of such bank, the deposits of which were then and there insured by the Federal Deposit Insurance Corporation.

(Title 18, United States Code, Sections 2113(a) and 3551 et seq.)

COUNT FIVE  
(Attempted Robbery of Dime Bank)

5. On or about October 8, 2011, within the Eastern District of New York, the defendant CORY BROWN did knowingly and intentionally attempt to take by force, violence and intimidation, from the person and presence of employees of Dime Bank, 209 Havemeyer Street, Brooklyn, New York, money in the care, custody, control, management and possession of such bank, the deposits of which were then and there insured by the Federal Deposit Insurance Corporation.

(Title 18, United States Code, Sections 2113(a) and 3551 et seq.)

COUNT SIX  
(Robbery of Chase Bank)

6. On or about October 11, 2011, within the Eastern District of New York, the defendant CORY BROWN did knowingly and intentionally take by force, violence and intimidation, from the person and presence of employees of Chase Bank, 20 Flatbush

Avenue, Brooklyn, New York, money in the care, custody, control, management and possession of such bank, the deposits of which were then and there insured by the Federal Deposit Insurance Corporation.

(Title 18, United States Code, Sections 2113(a) and 3551 et seq.)

COUNT SEVEN

(Attempted Robbery of Chase Bank)

7. On or about October 18, 2011, within the Eastern District of New York, the defendant CORY BROWN did knowingly and intentionally attempt to take by force, violence and intimidation, from the person and presence of employees of Chase Bank, 402 Myrtle Avenue, Brooklyn, New York, money in the care, custody, control, management and possession of such bank, the deposits of which were then and there insured by the Federal Deposit Insurance Corporation.

(Title 18, United States Code, Sections 2113(a) and 3551 et seq.)

COUNT EIGHT

(Robbery of Capitol One Bank)

8. On or about October 20, 2011, within the Eastern District of New York, the defendant CORY BROWN did knowingly and intentionally take by force, violence and intimidation, from the person and presence of employees of Capital One Bank, 356 Fulton Street, Brooklyn, New York, money in the care, custody, control, management and possession of such bank, the deposits of which

were then and there insured by the Federal Deposit Insurance Corporation.

(Title 18, United States Code, Sections 2113(a) and 3551 et seq.)

COUNT NINE

(Robbery of Chase Bank)

9. On or about October 21, 2011, within the Eastern District of New York, the defendant CORY BROWN did knowingly and intentionally take by force, violence and intimidation, from the person and presence of employees of Chase Bank, 819 Grand Street, Brooklyn, New York, money in the care, custody, control, management and possession of such bank, the deposits of which were then and there insured by the Federal Deposit Insurance Corporation.

(Title 18, United States Code, Sections 2113(a) and 3551 et seq.)

COUNT TEN

(Attempted Robbery of Bank of America)

10. On or about October 22, 2011, within the Eastern District of New York, the defendant CORY BROWN did knowingly and intentionally attempt to take by force, violence and intimidation, from the person and presence of employees of Bank of America, 47 Graham Avenue, Brooklyn, New York, money in the care, custody, control, management and possession of such

bank, the deposits of which were then and there insured by the Federal Deposit Insurance Corporation.

(Title 18, United States Code, Sections 2113(a) and 3551 et seq.)

COUNT ELEVEN  
(Robbery of Chase Bank)

11. On or about October 24, 2011, within the Eastern District of New York, the defendant CORY BROWN did knowingly and intentionally take by force, violence and intimidation, from the person and presence of employees of Chase Bank, 225 Havemeyer Street, Brooklyn, New York, money in the care, custody, control, management and possession of such bank, the deposits of which were then and there insured by the Federal Deposit Insurance Corporation.

(Title 18, United States Code, Sections 2113(a) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

12. The United States hereby gives notice to the defendant that, upon his conviction of any offense charged in Counts One through Eleven, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), of any property constituting or derived from proceeds obtained directly or indirectly as a result of such offenses.

13. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value or

e. has been commingled with other property which cannot be divided without difficulty;

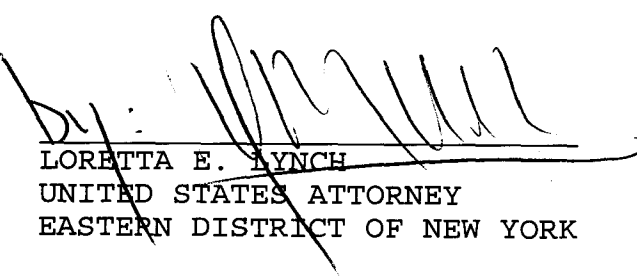
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any

other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

  
FOREPERSON

  
LORETTA E. LYNCH  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK



No.

**UNITED STATES DISTRICT COURT**

*EASTERN District of NEW YORK*

**CRIMINAL DIVISION**

**THE UNITED STATES OF AMERICA**

vs.

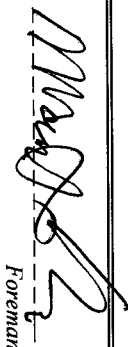
**CORY BROWN**

Defendant.

**INDICTMENT**

(T. 18, U.S.C., §§ 981(a)(1)(C), 2113(a) and 3551 et seq.;  
T. 21 U.S.C. § 853(p); T. 28, U.S.C., § 2461(c))

*A true bill.*

  
Foreman

Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

\_\_\_\_\_  
Clerk

Bail, \$ \_\_\_\_\_

*Nadia I. Shihata, Assistant United States Attorney, (718) 254-6295*